

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK



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U.S. DISTRICT COURT E.D.N.Y.

★ OCT 24 2022 ★

BROOKLYN OFFICE

20-CV-03868
October 12, 2022
DG

Letter Motion

RE: **Jacqueline Silver vs. NYPD Detective John Seel 20-CV-06348**
Jacqueline Silver vs City of New York Et al 20-CV-03868

Hon. Gujarati:

I am the pro-se plaintiff in the above referenced actions. I am seeking an extension of time for multiple reasons. As you are well aware, I am not an attorney, I am simply a layman trying to get justice from being falsely arrested. I don't have the funds to hire an attorney as we both know it is very expensive. I am being step all over and taking advantage of by Rami Louis. He is filling the Judge with allegations and not facts .

I contacted the prose office today to find out where in the courts rules and procedures does it allow the attorney for Detectives Seel and Galgano to go behind my back (without telling me) and submit my email that I innocently emailed to Ramy Louis (in passing) about the criminal appeal I have pending. Ramy Louis used this against me, that is VERY unethical. I had no idea that he was going to do this. Ms. Louis didn't even have the audacity to discuss the email with me or respond to it. I spoke with Jose-Prose office and unfortunately, he couldn't tell me in the Federal Rules of Civil Procedure where it states that the Corporate Counsel is allowed to do this. I need time to research this as the Pro Se office couldn't help me and I presently do not have an attorney. I also need more time because I need to submit an application for the court to appoint counsel, as I don't have the funds to litigate these two actions. I am in the process of getting advice from the City Bar Justice Center.

I am not understanding how Mr. Louis is allowed to do this, (use it as an exhibit) .I don't understand how Hon. Tiscione ruled on this when I was not present. Another problem is that I was told this by my lawyer from Appellate Advocate , which I probably violated the client-lawyer confidentiality with him. I never would have imagined that Ramy Louis, an attorney would behave unethical like this. Not only did he go behind my back and tell Hon. Tiscione , he left me in an uncomfortable position with Appellate Advocates. Where does Ramy Louis come off repeating what I said in an email to Hon. Tiscione without my knowledge? Isn't this exparte communications?

I mentioned to Ramy Louis that we should have a status conference with Hon. Tiscione , he never answered me . Doesn't this email have to be submitted in a conference when all parties are present.

Your Honor , I also don't understand how I have to give these releases when the defendants on both cases didn't even put in their answer. Where does it say that I have to sign releases? Both Ramy and I never had any conversation about what I emailed hm. This is very unfair and possibly detrimental to my cases as I didn't know that he can submit it to the judge behind my back. If I would've known this I would've never emailed him. I don't even know if what the lawyer from my appeal told me is even accurate and true. I just emailed it in a nonchalant manner. I need to respond to the lawyer's letter, in which there are fallacies and inaccuracies. I NEVER refused to provide the releases. He is making that up. For a lawyer his behavior is unethical and unprofessional. I am not a lawyer and need to understand why I need to provide releases.

I need more time to respond to Hon. Tiscione's September 23rd order for the above reasons. I also need clarification on where in the Federal Rules of Civil Procedure does it state that a plaintiff has to submit to the defendants a release. I need to do research on these matters so I can be prepared if I can't get a lawyer from the court. Can we schedule a conference with the judge to clear this all up?

Pro se plaintiff has a right to challenge and oppose the Corporate Counsels September 21st , 2022 letter to Honorable Tiscione as well as Hon. Tiscione's order dated September 23rd

Due to all the high holidays (Jewish) from end of September until October 18th it was very difficult to move
Best; forward with my two false arrest cases

Jacqueline Silver
Pro Se Plaintiff
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